

SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	Intentionally Omitted (<i>Ex Parte</i> Motion to be File Concurrently)
Exhibit 3	Intentionally Omitted (No Brief Required)
Exhibit 4	Certificate of Service
Exhibit 5	Intentionally Omitted
Exhibit 6	Documentary Exhibits
Exhibit A	10/15/13 Correspondence from T. Ciantra to M. Nelson
Exhibit B	10/18/13 Correspondence from M. Nelson to T. Ciantra
Exhibit C	Document Production SOM4003136 to SOM40003154
Exhibit D	Excerpts of Governor R. Snyder 10/9/13 Deposition

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

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	:	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No.: 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
-----	X	

**ORDER ON MOTION OF INTERNATIONAL UNION,
UAW AND THE *FLOWERS* PLAINTIFFS TO COMPEL
PRODUCTION OF DOCUMENTS WITHHELD ON
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

This matter coming before the Court on the motion (the “Motion”) of the International Union, UAW and Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman, as plaintiffs in the suit *Flowers v. Snyder*, No. 13-729 CZ (Ingham County Circuit Court) (the “*Flowers* plaintiffs”) To Compel Production of Documents Withheld on Grounds of Privilege and the Court having considered UAW’s Motion, and any responses thereto; and good cause appearing;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The State is ordered to produce any documents reflecting communications with Kevyn Orr counsel withheld on the grounds of common

interest privilege which documents ante-date March 15, 2013 when Orr was appointed Emergency Manager of the City of Detroit.

3. The State is ordered to produce documents withheld on the grounds of attorney-client as identified at the hearing on this motion.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Signed on _____

Hon. Steven W. Rhodes
United States Bankruptcy Judge

EXHIBIT 2

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EXHIBIT 3

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EXHIBIT 4

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

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	:	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No.: 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
-----	X	

CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of October 2013, I caused the *Ex Parte Motion to Expedite Hearing of International Union, UAW and the Flowers' Plaintiffs' Motion to Compel Production of Documents Withheld on Grounds of Privilege by the State of Michigan* to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: New York, New York
October 21, 2013

Cohen, Weiss and Simon LLP

By: /s/ Babette A. Ceccotti
330 West 42nd Street
New York, New York 10036-6979
T: (212) 563-4100
bceccotti@cwsny.com

Attorneys for International Union, UAW

EXHIBIT 5

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